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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## OAKLAND DIVISION

UNITED STATES OF AMERICA, ) No. 4:23-cr-00110 YGR  
Plaintiff, )  
v. ) JOINT STATEMENT OF THE CASE  
DARRELL WAYNE SMITH, ) Hon. Yvonne Gonzalez Rogers  
Defendant. ) Trial Date: March 17, 2025

The parties hereby jointly file this statement of the case.

## STATEMENT OF THE CASE

The government has charged Darrell Wayne Smith with crimes related to his alleged sexual abuse of female inmates of the Bureau of Prisons Federal Correctional Institute Dublin (“FCI Dublin”). The government alleges that while a Correctional Officer at FCI Dublin, Mr. Smith sexually abused five different inmates – Shayla, Lea, Claudia, Lisa, and Fabiola.

The charges against Mr. Smith are contained in an Indictment. The Indictment alleges fifteen counts, which are summarized as follows:

- a. Counts One through Six relate to Mr. Smith's alleged abuse of Shayla.
    - a. In Counts One through Four, Mr. Smith is charged with abusive sexual contact in violation of Title 18, United States Code, Section 2244(a)(4). Specifically in Counts One and Two, the government alleges that Mr. Smith touched Shayla's buttocks on two separate occasions while in her cell at the prison. In Count Three, the government alleges that Mr. Smith touched Shayla's inner thigh and groin while in her cell at the prison. Count Four alleges another instance of Mr. Smith touching Shayla's groin in her cell.
    - b. In Count Five, Mr. Smith is charged with aggravated sexual abuse in violation of Title 18, United States Code, Section 2241(a). The government alleges that Mr. Smith digitally penetrated Shayla's anal opening by using force against Shayla.
    - c. Finally, in Count Six, Mr. Smith is charged with deprivation of rights under color of law in violation of Title 18, United States Code, Section 242. This Count alleges that by digitally penetrating Shayla's anal opening by using force against Shayla, as alleged in Count Five, Mr. Smith deprived Shayla of the Constitutional right not to be subject to cruel and unusual punishment.

1 b. Counts Seven through Nine relate to Mr. Smith's alleged abuse of Lea. In each of these  
2 counts, Mr. Smith is charged with sexual abuse of a ward in violation of Title 18, United  
3 States Code, Section 2243(b).

4 a. Specifically, in Count Seven, the government alleges that Mr. Smith digitally  
5 penetrated Lea's genital opening while in her prison cell. In Counts Eight and  
6 Nine, the government alleges that Mr. Smith digitally penetrated Lea's genital  
7 opening on two different occasions while in a laundry room in the prison.

8 c. Counts Ten through Thirteen relate to Mr. Smith's alleged abuse of Claudia. Mr. Smith  
9 is charged in Counts Ten and Twelve with abusive sexual contact in violation of  
10 Title 18, United States Code, Section 2244(a)(4), and in Counts Eleven and Thirteen  
11 with sexual abuse of a ward in violation of Title 18, United States Code, Section  
12 2243(b).

13 a. In Counts Ten and Twelve, the government alleges that Mr. Smith, on two  
14 separate occasions, touched Claudia's breast and buttocks while in a laundry  
15 room in the prison.

16 b. In Count Eleven, the government alleges that on a different occasion while in a  
17 prison laundry room, Mr. Smith digitally penetrated Claudia's genital opening.

18 c. In Count Thirteen, the government alleges that Mr. Smith penetrated Claudia's  
19 genital opening with his penis while in a janitor's closet at the prison.

20 d. Count Fourteen relates to Mr. Smith's alleged abuse of Lisa. In this count, Mr. Smith is  
21 charged with abusive sexual contact in violation of Title 18, United States Code, Section  
22 2244(a)(4). The government alleges that Mr. Smith touched Lisa's breast while in her  
23 cell at the prison.

24 e. Count Fifteen relates to Mr. Smith's alleged abuse of Fabiola. In this count, Mr. Smith  
25 is charged with sexual abuse of a ward in violation of Title 18, United States Code,  
26 Section 2243(b). The government alleges that Mr. Smith digitally penetrated Fabiola's  
27 genital opening while in her cell at the prison.

1 Mr. Smith has pleaded not guilty to the charges against him and is presumed innocent unless and  
2 until the government proves Mr. Smith's guilt beyond a reasonable doubt.

3 Assistant United States Attorneys Andrew Paulson and Sailaja M. Paidipaty will be prosecuting  
4 this case and representing the United States of America. Mr. Smith is represented by defense counsel  
5 Naomi Chung and Joanna Sheridan.

6 DATED: February 21, 2025

Respectfully submitted,

7  
8 PATRICK D. ROBBINS  
Acting United States Attorney

9  
10 /s/ Andrew Paulson  
11 ANDREW PAULSON  
SAILAJA M. PAIDIPATY  
Assistant United States Attorneys

12 DATED: February 21, 2025

13  
14 /s/ Naomi Chung  
15 NAOMI CHUNG  
JOANNA SHERIDAN  
16 Attorneys for Defendant Darryl Wayne  
17 Smith